

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SCOTT PALMER HOLMES : CHAPTER 13  
Debtor(s) :  
 :  
 :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
 :  
vs. :  
 :  
 :  
SCOTT PALMER HOLMES :  
Respondent(s) : CASE NO. 5-18-bk-01995

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 20<sup>th</sup> day of May, 2021, comes, Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:

- a. Clarification of debtor(s) counsel fees which are in conflict with 2016(b) Statement. A Fee Application is required because counsel is seeking more than \$500.00 for the services rendered in connection with this Motion to Modify Plan.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 20th day of May, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Tullio DeLuca, Esquire  
381 N. 9<sup>th</sup> Avenue  
Scranton, PA 18504

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee